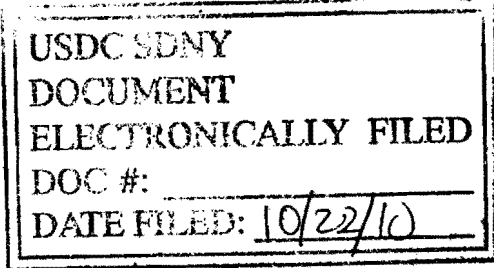


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DENISE A. RUBIN
GENERAL COUNSEL
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October 21, 2010

The request to enlarge time to file amended complaints is granted. Amended complaints must be filed by December 22, 2010.
SO ORDERED.

Via Electronic Transmission

The Hon. Alvin K. Hellerstein
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1050
New York, New York 10007-1312

Re: *In re: World Trade Center Disaster Site Litigation*
21 MC 100 (AKH)

Dear Judge Hellerstein:

Alvin K. Hellerstein
October 21, 2010.

By this letter we respectfully request an enlargement of our time to prepare and file our amended pleadings responsive to this Court's sua sponte orders dismissing cases and granting leave to replead. As this Court is no doubt aware, as the November 8, 2010 deadline for opting in to the Amended Settlement Process Agreement ("SPA") draws near, every attorney and paralegal in our World Trade Center group (and many of those staff members not normally involved in our *In re: WTC* litigations) have been extremely busy meeting with, calling and taking calls from our clients who have questions about their settlement offers. Given the number of clients and the importance of meeting that November 8 deadline, these meetings and calls have consumed most of our time for weeks and will do so up to and including November 8. It should also go without saying that we anticipate and hope that many of those amended complaints will be obviated by the clients opting-in to the SPA by November 8.

In addition to the above most obvious concerns, your undersigned is also presently obligated to address three other appellate obligations; a brief due in the Appellate Division, First Department on November 9, a (N.Y. State) Court of Appeals Oral Argument on November 16 and a brief due (also in the First Department) on December 7. Both briefs have already been the subject of motions and resulting orders granting enlargements of our time to perfect the appeals, and these enlargements were necessitated by our *In re: World Trade Center* obligations. No additional enlargements may be anticipated for those clients' matters. While it would be nice if our work were confined to the *In re: WTC* matters, the reality is that these and other (non-appellate) matters are also pressing.

The Hon. Alvin K. Hellerstein
Re: In re: World Trade Center Disaster Site Litigation
21 MC 100, 102 and 103 (AKH)
October 21, 2010, page 2

Accordingly, we ask that in the dual interests of justice for our clients and *rachmones* for one very overworked appellate attorney, we might have until at least mid-December to prepare and file the amended Complaints.

Respectfully submitted,

WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Plaintiffs Co-Liaison Counsel

A handwritten signature in black ink, appearing to read "Denise A. Rubin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Denise A. Rubin

cc:

Special Masters
James E. Tyrrell, Esq.
Margaret Warner, Esq.
Andrew Carboy, Esq.